



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Frank O'Bannon  
Governor

Lori F. Kaplan  
Commissioner

August 25, 2003

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Haulmark Industries, Inc. / SPR 039-15419-00254

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 8/11/03

August 25, 2003

Mr. Brent Yoder  
Haulmark Industries, Inc.  
P.O. Box 281  
Bristol, Indiana 46507

Re: 039-15419  
First Significant Revision to  
FESOP Renewal 039-14190-00254

Dear Mr. Yoder.:

Haulmark Industries, Inc., was issued a FESOP Renewal on August 21, 2001 for cargo trailer manufacturing plant. A letter requesting changes to this permit to incorporate the SEP Project was received on January 13, 1998; and a letter requesting changes to the permit due to production increase was received on January 14, 2002. The changes qualify as a significant revision since the potential to emit VOC, and combined HAPs are each greater than twenty-five (25) tons per year, and single HAP is greater than ten (10) tons per year. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved as described in the attached Technical Support Document.

The modification consists of increase in the production of cargo trailers being manufactured by the plant from 2.39 units per hour to 4.34 units per hour. The plant includes the following equipment:

- (a) Two (2) Paint Stations, identified as EU-01A, equipped with HVLP spray applicators, equipped with dry filters for PM overspray, exhausted through six (6) stacks, known as S-1, S-2, S-3, S-4, S-5, and S-6. These booths production capacity will be increased from 2.39 units per hour to 3.75 units per hour.
- (b) One (1) Small Parts Paint Station, identified as EU-01B, an existing exempted booth painting small parts. It will be incorporated into the production process to increase the plant's capacity and will be utilized to coat smaller trailer units, equipped with HVLP spray applicators, with a production capacity of 1.41 units per hour, with dry filters for PM overspray.
- (c) One (1) General Assembly Area, identified as Assembly, exhausted to general ventilation (GV), production capacity will be increased from 2.39 units per hour to 4.34 units per hour.

The source will also implement the following SEP projects to satisfy the Agreed Order Cause No.: A-3716, issued by IDEM, Office of Enforcement on January 21, 1998:

- (a) Replacement of the Seal-N-Sound coating with a lower VOC coating.
- (b) The spray undercoating booth, known as EU-2 has been removed physically from the operation.

The source has also made the following measures on insignificant activities per the Agreed

Order Cause No.: A-3716, issued by IDEM, Office of Enforcement on January 21, 1998:

- (a) The installation of a recyclable phosphorous wash system to provide additional preparation to the metal parts prior to application of coating.
- (b) An additional drying station to allow rinse solution to be removed from metal surfaces.
- (c) A curing area with a natural gas heating system to ensure a uniform temperature for proper curing of the trailers.
- (d) Relocation/consolidation of painting operations to accommodate the new process.
- (e) Removal of spray undercoating booth EU-2
- (f) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

Additional additions and modifications of the permit conditions requested by the applicant:

- (a) To replace references to a paint booth with language referring to a "paint station" instead.

The following construction conditions are applicable to the proposed project:

1. General Construction Conditions  
The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit  
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 (Revocation), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5.  
If you have any questions on this matter, please contact Aida De Guzman OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call at (800) 451-6027, press 0 and ask for Aida De Guzman or extension (3-4972), or dial (317) 233-4972.

Sincerely,

Original signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

APD

cc: File - Elkhart County  
U.S. EPA, Region V  
Elkhart County Health Department  
Northern Regional Office  
Air Compliance Section Inspector - Paul Karkiewicz  
Compliance Data Section - Karen Nowak  
Administrative and Development  
Technical Support and Modeling - Michele Boner

# **FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY**

**Haulmark Industries, Inc.  
14054 CR 4 East  
Bristol, Indiana 46507**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 039-14190-00254	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 21, 2001  Expiration Date: August 21, 2006
1 <sup>st</sup> Significant Permit Revision No.: 039-15419	Pages Affected: 4, 5, 23, 24, 25, 26, 31 Pages Added: 31a
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: August 25, 2003

## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a cargo trailer manufacturing source.

Authorized Individual:	L. Michael Arnold
Source Address:	14054 CR 4 East, Bristol, Indiana 46507
Mailing Address:	P.O. Box 281, Bristol, Indiana 46507
General Source Phone Number:	800 - 348 - 7530
SIC Code:	3715
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) Paint Stations, identified as EU-01A, equipped with HVLP spray applicators, equipped with dry filters for PM overspray, exhausted through six (6) stacks, known as S-1, S-2, S-3, S-4, S-5, and S-6. These booths production capacity will be increased from 2.39 units per hour to 3.75 units per hour.
- (b) One (1) Small Parts Paint Station, identified as EU-01B, an existing exempted booth painting small parts. It will be incorporated into the production process to increase the plant's capacity and will be utilized to coat smaller trailer units, equipped with HVLP spray applicators, with a production capacity of 1.41 units per hour, with dry filters for PM overspray.
- (c) One (1) General Assembly Area, identified as Assembly, exhausted to general ventilation (GV), production capacity will be increased from 2.39 units per hour to 4.34 units per hour.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment. (326 IAC 6-3-2)
- (b) Using 80 tons or less of welding consumables. (326 IAC 6-3-2)
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

The source will also implement the following SEP projects to satisfy the Agreed Order Cause No.: A-3716, issued by IDEM, Office of Enforcement on January 21, 1998:

- (a) Replacement of the Seal-N-Sound coating with a lower VOC coating.
- (b) The spray undercoating booth, known as EU-2 has been removed physically from the operation.

The source has also made the following measures on insignificant activities per the Agreed Order Cause No.: A-3716, issued by IDEM, Office of Enforcement on January 21, 1998:

- (a) The installation of a recyclable phosphorous wash system to provide additional preparation to the metal parts prior to application of coating.
- (b) An additional drying station to allow rinse solution to be removed from metal surfaces.
- (c) A curing area with a natural gas heating system to ensure a uniform temperature for proper curing of the trailers.
- (d) Relocation/consolidation of painting operations to accommodate the new process.
- (e) Removal of spray undercoating booth EU-2.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP) Renewal.

A.5 Prior Permit Conditions

- (a) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits.
- (b) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

- (a) Two (2) Paint Stations, identified as EU-01A, equipped with HVLP spray applicators, equipped with dry filters for PM overspray, exhausted through six (6) stacks, known as S-1, S-2, S-3, S-4, S-5, and S-6. These booths production capacity will be increased from 2.39 units per hour to 3.75 units per hour.
- (b) One (1) Small Parts Booth, identified as EU-01B, an existing exempted booth painting small parts, exhausting to six (6) stacks, known as S-1, S-2, S-3, S-4, S-5, and S-6. It will be incorporated into the production process to increase the plant's capacity and will be utilized to coat smaller trailer units, equipped with HVLP spray applicators, with a production capacity of 1.41 units per hour, with dry filters for PM overspray.
- (c) One (1) General Assembly Area, identified as Assembly, exhausted to general ventilation, production capacity will be increased from 2.39 units per hour to 4.34 units per hour.

**(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)**

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4]

The input of volatile organic compounds (VOC) delivered to the applicators including clean-up solvents at the two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B; and the one (1) General Assembly Area, identified as Assembly shall be limited to less than 100 tons per year. Compliance with this limit will make 326 IAC 2-7 Part 70 Permit Program not applicable.

#### D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the daily volume weighted average volatile organic compound (VOC) content of coating delivered to the applicators at EU-01A, EU-01B and Assembly, when coating metal parts, shall be limited to three and five-tenths (3.5) pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, EU-01A, EU-01B and Assembly are in compliance with this requirement. The source shall comply with this rule by limiting the VOC content on a daily basis. The daily volume weighted average of VOC content shall be calculated using the following formula:

$$\text{lb VOC/gal less water} = \frac{3 \text{ coating } [D * O * Q] / [1-w * D_c/D_w]}{(3 \text{ coats, gal / unit})}$$

Where:

D<sub>c</sub> = density of coating, lb/gal



Dw = density of water, 8.33 lb/gal  
O = weight percent organics, %  
W = percent volume water, %  
Q = quantity of coating, gal/unit  
C = Total coatings used, gal/unit

**D.1.3 PM<sub>10</sub> [326 IAC 2-8-4]**

Any change or modification which may increase potential to emit PM<sub>10</sub> from the entire source to one hundred (100) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

**D.1.4 HAPs [326 IAC 2-8-4]**

Pursuant to 326 IAC 2-8:

- (a) The single HAP input delivered to the applicators including clean-up solvents at two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B; and the one (1) General Assembly Area, identified as Assembly shall be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.
- (b) The combined HAPs input delivered to the applicators including clean-up solvents at two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B; and the one (1) General Assembly Area, identified as Assembly shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.

**D.1.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

**Compliance Determination Requirements**

**D.1.6 Particulate Matter (PM) [326 IAC 6-3-2]**

Pursuant to 326 IAC 6-3-2, the dry filters for the two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B, shall be in place at all times whenever the booths are in operation.

**D.1.7 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1 and D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

**D.1.8 VOC Emissions**

- (a) Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the twelve (12) month period.
- (b) Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for each day.

## **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

### **D.1.9 Monitoring**

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- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating stations' stacks S1 through S6 while one or more of the coating stations are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

### **D.1.10 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) and (2), (4) through (6) below, and shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC and emission limits established in Condition D.1.1.
- (b) To document compliance with Condition D.1.2, the Permittee shall maintained records with (1), (2), (3), (5) and (6) daily if using a combination of compliant and non-compliant coatings; and a monthly record if using all compliant coatings and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC and emission limits established in Condition D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used;
  - (4) The cleanup solvent usage;
  - (5) The total VOC usage; and
  - (6) The weight of VOCs emitted for each compliance period.

- (c) To document compliance with Conditions D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP and emission limits established in Condition D.1.4.
  - (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - 2) A log of the dates of use;
  - (3) The cleanup solvent usage for each month;
  - (4) The total HAP usage for each month; and
  - (5) The weight of HAPs emitted for each compliance period.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.11 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.1 and D.1.4 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Haulmark Industries, Inc.  
Source Address: 14054 CR 4 East, Bristol, Indiana 46507  
Mailing Address: P.O. Box 281, Bristol, Indiana 46507  
FESOP No.: 039-14190-00254  
Facility: EU-01A, EU-01B, and Assembly  
Parameter: VOC  
Limit: Less than 100 tons per twelve (12) consecutive month period

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month			
	This Month	Previous 11 Months	12 Month Total
1			
2			
3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Haulmark Industries, Inc.  
Source Address: 14054 CR 4 East, Bristol, Indiana 46507  
Mailing Address: P.O. Box 281, Bristol, Indiana 46507  
FESOP No.: 039-14190-00254  
Facility: EU-01A, EU-01B, and Assembly  
Parameter: Single HAP and Combined HAPs  
Limit: Single HAP less than 10 tons per twelve (12) consecutive month period  
Combined HAPs less than 25 tons per twelve (12) consecutive month period

QUARTER: \_\_\_\_\_ YEAR: \_\_\_\_\_

Month	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
1						
2						
3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

**Technical Support Document (TSD) for a Significant Permit Revision to a  
Federally Enforceable State Operating Permit**

**Source Background and Description**

Source Name:	Haulmark Industries, Inc.
Source Location:	14054 CR 4 East Bristol, Indiana 46507
County:	Elkhart
SIC Code:	3715
Operation Permit No.:	F 039-14190-00254
Operation Permit Issuance Date:	August 21, 2001
Significant Permit Revision No.:	039-15419
Permit Reviewer:	Aida De Guzman

The Office of Air Quality (OAQ) has reviewed a revision application from Haulmark Industries, Inc. relating to the increase in the production of cargo trailers being manufactured by the plant from 2.39 units per hour to 4.34 units per hour. The plant includes the following equipment:

- (a) Two (2) Paint Stations, identified as EU-01A, equipped with HVLP spray applicators, equipped with dry filters for PM overspray, exhausted through six (6) stacks, known as S-1, S-2, S-3, S-4, S-5, and S-6. These booths production capacity will be increased from 2.39 units per hour to 3.75 units per hour.
- (b) One (1) Small Parts Paint Station, identified as EU-01B, an existing exempted booth painting small parts. It will be incorporated into the production process to increase the plant's capacity and will be utilized to coat smaller trailer units, equipped with HVLP spray applicators, with a production capacity of 1.41 units per hour, with dry filters for PM overspray.
- (c) One (1) General Assembly Area, identified as Assembly, exhausted to general ventilation (GV), production capacity will be increased from 2.39 units per hour to 4.34 units per hour.

The source will also implement the following SEP projects to satisfy the Agreed Order Cause No.: A-3716, issued by IDEM, Office of Enforcement on January 21, 1998:

- (a) Replacement of the Seal-N-Sound coating with a lower VOC coating.
- (b) The spray undercoating booth, known as EU-2 has been removed physically from the operation.

The source has also made the following measures on insignificant activities per the Agreed Order Cause No.: A-3716, issued by IDEM, Office of Enforcement on January 21, 1998:

- (a) The installation of a recyclable phosphorous wash system to provide additional preparation to the metal parts prior to application of coating.
- (b) An additional drying station to allow rinse solution to be removed from metal surfaces.

- (c) A curing area with a natural gas heating system to ensure a uniform temperature for proper curing of the trailers.
- (d) Relocation/consolidation of painting operations to accommodate the new process.
- (e) Removal of spray undercoating booth EU-2

Additional additions and modifications of the permit conditions requested by the applicant:

- (a) To replace references to a paint booth with language referring to a "paint station" instead.

## **History**

On January 14, 2002, Haulmark Industries, Inc. submitted an application to the OAQ requesting to increase the plant's production. Haulmark Industries, Inc. was issued a FESOP on August 21, 2001. The SEP project application was submitted on January 13, 1998, with additional information received on February 25, 1999. These two (2) applications 039-9391 and 039-15149 were combined together into 039-15149.

## **Existing Approvals**

The source was issued a Federally Enforceable State Operating Permit (FESOP) F039-6280-00254 on December 9, 1996, which has been renewed on August 21, 2001 with FESOP Renewal number F039-14190-00254.

## **Recommendation**

The staff recommends to the Commissioner that the Significant Permit Revision be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

The SEP project application for the purposes of this review was received on January 13, 1998, with additional information received on February 10, 1999; February 25, 1999; and May 16, 2001.

The application for the increase in production was received on January 14, 2002, with additional information received on April 12, 2002; August 1, 2002; February 19, 2003; and April 9, 2003.

## **Emission Calculations**

See Page 1 and 2 of 2 TSD Appendix A of this document for detailed emissions calculations.

## **Potential To Emit**

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

Pollutant	Potential To Emit (tons/year)
PM	40.74
PM-10	40.74
SO <sub>2</sub>	0.0
VOC	185.45
CO	0.0
NO <sub>x</sub>	0.0

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential To Emit (tons/year)
Xylene	21.47
Toluene	30.70
MEK	0.20
Single HAP	30.70
Combined HAPs	52.37

### Justification for the Permit Level

- (a) Based on the new production rate, the potential to emit (as defined in 326 IAC 2-1.1-1(16)) of volatile organic compounds (VOC), Particulate Matter or Particulate Matter Less Than Ten Microns (PM10) are each greater than 25 tons per year. Therefore, the FESOP is subject to the Significant Permit Revision, pursuant to 326 IAC 2-8-11.1(f);
- or
- (b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the FESOP is subject to the Significant Permit Revision, pursuant to 326 IAC 2-8-11.1(f).

### Limited Potential to Emit

The source will continue to be permitted under the FESOP Program. The table below summarizes the total potential to emit, reflecting all controls and limits of the significant emission units.

Pollutant	Potential To Emit (tons/year)
PM	< 1.1
PM-10	< 1.1
SO <sub>2</sub>	0.0
VOC	< 100
CO	0.0
NO <sub>x</sub>	0.0
Single HAP	< 10
Combined HAPs	< 25

Since the VOC input will be limited to restrict the VOC emissions to less than 100 tons per year to avoid the applicability of Part 70, then the PM and PM10 emissions controlled will also follow. See below calculations.



$$\begin{aligned} \text{PM/PM}_{10} \text{ Limit} &= \frac{\text{Total PTE Controlled PM/PM}_{10} \text{ emission, 2.04 tons/yr}}{\text{Total PTE VOC emission, 185.45 tons/yr}} * \text{VOC limit, <100 tons/yr} \\ &= < 1.1 \text{ tons/year} \end{aligned}$$

### County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	attainment
CO	attainment
Lead	not determined

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

### Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to this source.

### State Rule Applicability - Entire Source

- (a) 326 IAC 2-2 (Prevention of Significant Deterioration)  
The modification to an existing minor source for PSD is not subject to 326 IAC 2-2, as no criteria pollutant is emitted at greater than 250 tons per year.
- (b) 326 IAC 5-1 (Visible Emissions Limitations)  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (1) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (2) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

### State Rule Applicability - Individual Facilities

- (a) 326 IAC 8-2-9 (Miscellaneous Metal Coating)  
Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volatile organic compound (VOC) content of coating delivered to the applicator at the spray paint stations shall be limited to 3.5 pounds of VOCs per gallon of coating less water, for extreme performance coatings.

The attached spreadsheet shows the volumetric weighted average of the VOC content of the metal coatings to be less than 3.5 lbs/gal less water at 1.87 lbs of VOC per gallon of coating less water. Therefore, the source is in compliance with the rule.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

- (b) 326 IAC 2-4.1-1 (New Source Toxic Control)  
This rule applies to new construction reconstruction of major sources of HAPs after July 27, 1997. This rule does not apply, as the project is a modification and the source's single HAP or combined HAPs is limited to less than the major levels.
- (c) 326 IAC 6-3-2 (Particulate Emission Limitations, Work Practices and Control Technologies)  
Pursuant to 326 IAC 6-3-2, the surface coating operation at the source shall be controlled by a dry filter, waterwash, or an equivalent control device subject to the following:
  - (1) The source shall operate the control device in accordance with manufacturer's specifications.
  - (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
    - (a) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
    - (b) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

## Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

## Changes to the Issued FESOP

The increase in capacity along with the SEP Project will result in the significant revision to the

FESOP F039-14190-00254, issued on August 21, 2001 (additions are **bolded** and deletions are ~~struck-through~~ for emphasis):

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

- (a) Two (2) ~~spray Paint booths~~ **Stations**, known ~~identified as~~ EU-01A, equipped with HVLP spray applicators, equipped with dry filters for PM overspray, exhausted through ~~three (3)~~ **six (6)** stacks, known as S-1, S-2, ~~and S-3, capacity: 2.39 cargo trailers per hour, S-4, S-5, and S-6. These booths production capacity will be increased from 2.39 units per hour to 4.34 units per hour.~~
- (b) ~~One (1) spray undercoating booth, known EU-02, equipped with air assisted airless spray applicators, equipped with dry filters for PM overspray, exhausted through two (2) stacks, known as S-4 and S-5, capacity: 2.39 cargo trailers per hour.~~ **One (1) Small Parts Booth, identified as EU-01B, an existing exempted booth painting small parts. It will be incorporated into the production process to increase the plant's capacity and will be utilized to coat smaller trailer units, equipped with HVLP spray applicators, with a production capacity of 4.34 units per hour, with dry filters for PM overspray.**
- (c) One (1) general assembly area, identified as Assembly, exhausted to general ventilation, ~~capacity: 2.39 cargo trailers per hour.~~ **production capacity will be increased from 2.39 units per hour to 4.34 units per hour.**

The source will also implement the following SEP projects to satisfy the Agreed Order Cause No.: A-3716, issued by IDEM, Office of Enforcement on January 21, 1998:

- (a) Replacement of the Seal-N-Sound coating with a lower VOC coating.
- (b) The spray undercoating booth, known as EU-2 has been removed physically from the operation.

The source has also made the following measures on insignificant activities per the Agreed Order Cause No.: A-3716, issued by IDEM, Office of Enforcement on January 21, 1998:

- (a) The installation of a recyclable phosphorous wash system to provide additional preparation to the metal parts prior to application of coating.
- (b) An additional drying station to allow rinse solution to be removed from metal surfaces.
- (c) A curing area with a natural gas heating system to ensure a uniform temperature for proper curing of the trailers.
- (d) Relocation/consolidation of painting operations to accommodate the new process.
- (e) Removal of spray undercoating booth EU-2

Additional additions and modifications of the permit conditions requested by the applicant:

- (a) To replace references to a paint booth with language referring to a "paint station" instead.

**A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]**

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment and welding equipment. (326 IAC 6-3-2)
- (b) Using 80 tons or less of welding consumables. (326 IAC 6-3-2)
- (c) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

2. Section D.1 will be revised to incorporate the changes:

**Facility Description [326 IAC 2-8-4(10)]:**

- (a) Two (2) ~~spray~~ Paint ~~booths~~ **Stations, identified as EU-01A, equipped with HVLP spray applicators, equipped with dry filters for PM overspray, exhausted through three (3) six (6) stacks, known as S-1, S-2, S-3, capacity: 2.39 cargo trailers per hour, S-4, S-5, and S-6. These booths production capacity will be increased from 2.39 units per hour to 3.75 units per hour.**
- (b) ~~One (1) spray undercoating booth, known EU-02, equipped with air assisted airless spray applicators, equipped with dry filters for PM overspray, exhausted through two (2) stacks, known as S-4 and S-5, capacity: 2.39 cargo trailers per hour.~~ **One (1) Small Parts Booth, identified as EU-01B, an existing exempted booth painting small parts, exhausting to six (6) stacks, known as S-1, S-2, S-3, S-4, S-5, and S-6. It will be incorporated into the production process to increase the plant's capacity and will be utilized to coat smaller trailer units, equipped with HVLP spray applicators, with a production capacity of 1.41 units per hour, with dry filters for PM overspray.**
- (c) One (1) General Assembly Area, identified as Assembly, exhausted to general ventilation, ~~capacity: 2.39 cargo trailers per hour.~~ **production capacity will be increased from 2.39 units per hour to 4.34 units per hour.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

**Emission Limitations and Standards [326 IAC 2-8-4(1)]**

**D.1.1 Volatile Organic Compounds (VOC) Limit [326 IAC 2-8-4]**

~~The volatile organic compounds (VOCs) delivered to the applicators in EU-01, EU-02 and Assembly, including cleanup solvents shall be limited to less than 99.0 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-7 are not applicable.~~  
**The input of volatile organic compounds (VOC) delivered to the applicators including clean-up solvents at the two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B; and the one (1) General Assembly Area, identified as Assembly shall be limited to less than 100 tons per year. Therefore, the requirements of 326 IAC 2-7 do not apply.**

**D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]**

~~The particulate matter (PM) from EU-01, EU-02 and Assembly each, shall not be limited by the~~

following:

~~Interpolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

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$$E = 4.10 P^{0.67}$$

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where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.1.2-3 Volatile Organic Compound (VOC) [326 IAC 8-2-9]**

- (a) Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the daily volume weighted average volatile organic compound (VOC) content of coating delivered to the applicators at EU-01, EU-02 **EU-01A, EU-01B** and Assembly, when coating metal parts, shall be limited to three and five-tenths (3.5) pounds of VOCs per gallon of coating less water, for extreme performance coatings.

Solvent sprayed from application equipment during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and calculations made, ~~EU-01, EU-02~~ **EU-01A, EU-01B** and Assembly are in compliance with this requirement. The source shall comply with this rule by limiting the VOC content on a daily basis. The daily volume weighted average of VOC content shall be calculated using the following formula:

$$\text{lb VOC/gal less water} = \frac{3 \text{ coating } [D * O * Q]}{[1-w * Dc/Dw]}$$

**(3 coats, gal / unit)**

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$$\frac{3 \text{ coats } [\text{density lb / gal} \times \text{wt \% organics} \times \text{gal of mat'l, gal / unit} / (1-\% \text{ vol water}) \times (\text{density coat, lb / gal})]}{(\text{density water, lb / gal})}$$

---

**(3 coats, gal / unit)**

**Where:**

**Dc** = density of coating, lb/gal  
**Dw** = density of water, 8.33 lb/gal  
**O** = weight percent organics, %  
**W** = percent volume water, %  
**Q** = quantity of coating, gal/unit  
**C** = Total coatings used, gal/unit

**D.1.3 4 PM<sub>10</sub> [326 IAC 2-8-4]**

Any change or modification which may increase potential to emit PM<sub>10</sub> from the entire source to one hundred (100) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

**D.1.4 5 HAPs [326 IAC 2-8-4]**

Any change or modification which may increase potential to emit any combination of HAPs from the entire source to twenty-five (25) tons per year or any single HAP to ten (10) tons per year or more shall require approval from IDEM, OAQ prior to making the change.

**Pursuant to 326 IAC 2-8:**

- (a) The single HAP input delivered to the applicators including clean-up solvents at two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B; and the one (1) General Assembly Area, identified as Assembly shall

**be limited to less than ten (10) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.**

- (b) **The combined HAPs input delivered to the applicators including clean-up solvents at two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B; and the one (1) General Assembly Area, identified as Assembly shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period with compliance demonstrated at the end of each month. Therefore, the requirements of 326 IAC 2-7 do not apply.**

D.1.5 6 Preventive Maintenance Plan - no change

### **Compliance Determination Requirements**

**D.1.6 9 Particulate Matter (PM) [326 IAC 6-3-2]**

~~In order to comply with Condition D.1.2, Pursuant to 326 IAC 6-3-2, the dry filters for PM control shall be in operation at all times when from~~ **for the two (2) Paint Stations, identified as EU-01A; one (1) Small Parts Booth, identified as EU-01B , shall be in operation place at all times whenever the booths are in operation.**

D.1.7 and D.1.8 - no changes

### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

**D.1.9 40 Monitoring**

- (a) **Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stations' stacks S1 through S5 S6 while one or more of the booths coating stations are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**
- (b) **Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.**
- (c) **Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.**

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.10 44 Record Keeping Requirements**

- (a) **To document compliance with Conditions D.1.1, the Permittee shall maintain records in accordance with (1) and (2), (4) through (6) below, and shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC and emission limits established in Condition**

**D.1.1.**

- (b) **To document compliance with Condition D.1.2, the Permittee shall maintained records with (1), (2), (3), (5) and (6) daily if using a combination of compliant and non-compliant coatings; and a monthly record if using all compliant coatings and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC and emission limits established in Condition D.1.2.**
- (1) **The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;**
  - (2) **A log of the dates of use;**
  - (3) **The volume weighted VOC content of the coatings used;**
  - (4) **The cleanup solvent usage;**
  - (5) **The total VOC usage; and**
  - (6) **The weight of VOCs emitted for each compliance period.**
- (a) ~~To document compliance with Conditions D.1.1 and D.1.3, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.3.~~
- ~~(1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~
  - ~~(2) A log of the dates of use;~~
  - ~~(3) The volume weighted VOC content of the coatings used for each day;~~
  - ~~(4) The cleanup solvent usage for each month;~~
  - ~~(5) The total VOC, usage for each month; and~~
  - ~~(6) The weight of VOCs emitted for each compliance period.~~
- (c) **To document compliance with Conditions D.1.5 4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits and/or the HAP and emission limits established in Condition D.1.5 4.**
- (1) **The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage**

records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each ~~day~~ month;
  - (4) The total HAP usage for each ~~day~~ month; and
  - (5) The weight of HAPs emitted for each compliance period.
- (c) ~~To document compliance with Conditions D.1.9 and D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~
- (d-c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**D.1. 1142 Reporting Requirements**

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A quarterly summary of the information to document compliance with Condition ~~D.1.2~~ **D.1.1 and D.1.4** shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).



The following form will be updated to reflect the new coating stations:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Haulmark Industries, Inc.  
Source Address: 14054 CR 4 East, Bristol, Indiana 46507  
Mailing Address: P.O. Box 281, Bristol, Indiana 46507  
FESOP No.: 039-14190-00254  
Facility: ~~EU-01, EU-02~~ **EU-01A, EU-01B**, and Assembly  
Parameter: VOC  
Limit: Less than ~~99.0~~ **100** tons per twelve (12) consecutive month period

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month			
	This Month	Previous 11 Months	12 Month Total
<b>1</b>			
<b>2</b>			
<b>3</b>			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

The following form will be added for the HAPs emission limits:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

**Source Name:** Haulmark Industries, Inc.  
**Source Address:** 14054 CR 4 East, Bristol, Indiana 46507  
**Mailing Address:** P.O. Box 281, Bristol, Indiana 46507  
**FESOP No.:** 039-14190-00254  
**Facility:** EU-01A, EU-01B, and Assembly  
**Parameter:** Single HAP and Combined HAPs  
**Limit:** Single HAP less than 10 tons per twelve (12) consecutive month period  
Combined HAPs less than 25 tons per twelve (12) consecutive month period

**QUARTER:** \_\_\_\_\_ **YEAR:** \_\_\_\_\_

Month	This Month		Previous 11 Months		12 Month Total	
	Single HAP	Combined HAPs	Single HAP	Combined HAPs	Single HAP	Combined HAPs
1						
2						
3						

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

**Submitted by:** \_\_\_\_\_

**Title / Position:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**Phone:** \_\_\_\_\_

**Attach a signed certification to complete this report.**

**Conclusion**

The operation of this cargo trailers manufacturing plant shall be subject to the conditions of the attached **Significant FESOP Revision 039-15419-000254.**

Appendix A: Emissions Calculations  
VOC and Particulate  
From Surface Coating Operations

Page 1 of 2 TSD App A

Company Name: Haulmark Industries, Inc.  
Address City IN Zip: 14054 Co. Rd., 4 East Bristol, IN  
Significant FESOP Revision: 039-15419  
Pit ID: 039-00254  
Reviewer: Aida De Guzman  
Date Application Received: January 14, 2002

Material	Density (Lb/Gal)	Weight % Volatile (H2O & Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency	Summation of Coatings for 326 IAC 8-2-9 applicability	Substrate
GENERAL VENTILATION (GV)																		
Adhesive & Sealants																		
R-800 Windshield Sealant	10.2	30.00%	0.0%	30.0%	0.0%	61.00%	0.15700	4.340	3.05	3.05	2.08	49.84	9.10	0.00	5.00	100%	0.3923	steel
Red Contact 2621/Con-Bond	6.6	81.00%	0.0%	81.0%	0.0%	12.00%	0.00000	4.340	5.35	5.35	0.00	0.00	0.00	0.00	44.55	100%	0.0000	aluminum
Red Contact Adhesive TAACT283R-05	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.00142	4.340	3.81	3.81	0.02	0.56	0.10	0.00	0.00	100%	0.0045	aluminum
336300 Tub & Tile	11.8	32.00%	29.1%	2.9%	29.1%	68.00%	0.00000	4.340	0.48	0.34	0.00	0.00	0.00	0.00	0.50	100%	0.0000	vinyl
616 Vulcum Alum Caulk	8.7	10.00%	0.0%	10.0%	0.0%	0.00%	0.02810	4.340	0.87	0.87	0.11	2.55	0.46	0.00	0.00	100%	0.0234	aluminum
226100 Clear Geocel	7.9	35.08%	0.0%	35.1%	0.0%	0.00%	0.02810	4.340	2.77	2.77	0.34	8.12	1.48	0.00	0.00	100%	0.0821	aluminum
226101 Almond	7.8	35.00%	0.0%	35.0%	0.0%	0.00%	0.04870	4.340	2.71	2.71	0.57	13.76	2.51	0.00	0.00	100%	0.1420	aluminum
2000 Black Geocel	8.3	33.85%	0.0%	33.9%	0.0%	0.00%	0.04210	4.340	2.79	2.79	0.51	12.25	2.23	0.00	0.00	100%	0.1187	aluminum
SM 5522 Clear	8.8	32.60%	0.0%	32.6%	0.0%	0.00%	0.00000	4.340	2.88	2.88	0.00	0.00	0.00	0.00	0.00	100%	0.0000	aluminum
SM6014	13.0	3.00%	0.0%	3.0%	0.0%	0.00%	0.00000	4.340	0.39	0.39	0.00	0.00	0.00	0.00	0.00	100%	0.0000	aluminum
SM6010	8.3	42.44%	0.0%	42.4%	0.0%	0.00%	0.00000	4.340	3.50	3.50	0.00	0.00	0.00	0.00	0.00	100%	0.0000	aluminum
SM5504	8.3	42.44%	0.0%	42.4%	0.0%	0.00%	0.01659	4.340	3.50	3.50	0.25	6.05	1.10	0.00	0.00	100%	0.0586	aluminum
SM6010	8.3	42.44%	0.0%	42.4%	0.0%	0.00%	0.00095	4.340	3.50	3.50	0.01	0.35	0.06	0.00	0.00	100%	0.0034	aluminum
SM6014	13.0	3.00%	0.0%	3.0%	0.0%	0.00%	0.22312	4.340	0.39	0.39	0.38	9.08	1.66	0.00	0.00	100%	0.0558	aluminum
Yoder Truck-Bus Undercoating	8.3	38.44%	0.0%	38.4%	0.0%	0.00%	0.10430	4.340	3.19	3.19	1.44	34.66	6.33	0.00	0.00	100%	0.3340	aluminum
Seal-N-Sound Waterproofing	7.3	47.00%	0.0%	47.0%	0.0%	0.00%	0.69820	4.340	3.45	3.45	10.44	250.54	45.72	0.00	0.00	100%	2.7335	aluminum
Tremco 651	12.2	16.28%	0.0%	16.3%	0.0%	0.00%	0.00000	4.340	1.98	1.98	0.00	0.00	0.00	0.00	0.00	100%	0.0000	aluminum
Tremco Vulkan 616/613	10.0	10.00%	0.0%	10.0%	0.0%	0.00%	0.00000	4.340	1.00	1.00	0.00	0.00	0.00	0.00	0.00	100%	0.0000	aluminum
Geocel White 47715	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.01311	4.340	3.81	3.81	0.22	5.20	0.95	0.00	0.00	100%	0.0420	aluminum
Dap Wood Dough	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.01067	4.340	3.81	3.81	0.18	4.23	0.77	0.00	0.00	100%	0.0342	wood
Kwink Seal Tub & Tile Caulk Dap	12.5	4.33%	0.0%	4.3%	0.0%	0.00%	0.00000	4.340	0.54	0.54	0.00	0.00	0.00	0.00	0.00	100%	0.0000	vinyl
Custom Filled Spray Cans All Colors	7.4	91.76%	0.0%	91.8%	0.0%	1.71%	0.00000	4.340	6.79	6.79	0.00	0.00	0.00	0.00	397.09	75%	0.0000	aluminum
Black Touch-up (Utlilac)	6.3	85.40%	0.0%	85.4%	0.0%	11.00%	0.00000	4.340	5.35	5.35	0.00	0.00	0.00	0.00	48.68	75%	0.0000	steel
Rapid Dry Gloss Enamel	10.1	38.44%	0.0%	38.4%	0.0%	0.00%	0.00000	4.340	3.88	3.88	0.00	0.00	0.00	0.00	0.00	75%	0.0000	aluminum
Urethane Alkyd Gloss Enamel	9.6	38.44%	0.0%	38.4%	0.0%	0.00%	0.00000	4.340	3.69	3.69	0.00	0.00	0.00	0.00	0.00	75%	0.0000	aluminum
Moorcraft Super Hide Latex Flat	12.1	38.44%	0.0%	38.4%	0.0%	0.00%	0.00000	4.340	4.65	4.65	0.00	0.00	0.00	0.00	0.00	75%	0.0000	wood
Procoat Flat White Base	11.3	7.76%	0.0%	7.8%	0.0%	0.00%	0.00000	4.340	0.87	0.87	0.00	0.00	0.00	0.00	0.00	75%	0.0000	aluminum
Chrome Aluminum	6.4	38.44%	0.0%	38.4%	0.0%	0.00%	0.00000	4.340	2.45	2.45	0.00	0.00	0.00	0.00	0.00	75%	0.0000	steel
Solvents																		
#3 Wash	7.2	100.00%	0.0%	100.0%	0.0%	0.00%	0.03556	4.340	7.21	7.21	1.11	26.71	4.87	0.00	0.00	0%	0.2962	steel
Acetone	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.00012	4.340	3.81	3.81	0.00	0.05	0.01	0.01	0.00	0%	0.0004	steel
Thinner	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.00237	4.340	3.81	3.81	0.04	0.94	0.17	0.00	0.00	0%	0.0076	steel
Maintenance Items																		
Brake Cleaner	10.8	99.00%	0.0%	99.0%	0.0%	0.00%	0.00000	4.340	10.70	10.70	0.00	0.00	0.00	0.00	0.00	100%	0.0000	steel
C-32 Brake Cleaner	10.8	100.00%	0.0%	100.0%	0.0%	0.00%	0.00578	4.340	10.81	10.81	0.27	6.51	1.19	0.00	0.00	100%	0.0481	steel
Cyclo Brake & Parts Cleaner C-32	12.0	28.00%	0.0%	28.0%	0.0%	0.00%	0.00000	4.340	3.36	3.36	0.00	0.00	0.00	0.00	0.00	100%	0.0000	steel
Cyclo C-112 Brake & Parts Clean	12.1	33.00%	0.0%	33.0%	0.0%	0.00%	0.00000	4.340	3.99	3.99	0.00	0.00	0.00	0.00	0.00	100%	0.0000	steel
C-192 Max Clean All	8.3	10.00%	0.0%	10.0%	0.0%	0.00%	0.00244	4.340	0.83	0.83	0.01	0.21	0.04	0.00	0.00	100%	0.0020	aluminum
P-1208 Precleaner	6.4	100.00%	0.0%	100.0%	0.0%	0.00%	0.00047	4.340	6.37	6.37	0.01	0.31	0.06	0.00	0.00	100%	0.0039	aluminum
De-Solv-It Citrus Solution	6.6	31.70%	0.0%	31.7%	0.0%	0.00%	0.02370	4.340	2.08	2.08	0.21	5.13	0.94	0.00	0.00	100%	0.0626	aluminum
Hand Cleaner	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.00142	4.340	3.81	3.81	0.02	0.56	0.10	0.00	0.00	100%	0.0045	aluminum
Lemon Co-Jo Hand Cleaner	7.3	0.00%	0.0%	0.0%	0.0%	0.00%	0.00000	4.340	0.00	0.00	0.00	0.00	0.00	0.00	0.00	100%	0.0000	aluminum
WD-40	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.00098	4.340	3.81	3.81	0.02	0.39	0.07	0.00	0.00	100%	0.0031	steel
Cyclo Silicone Spray	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.00244	4.340	3.81	3.81	0.04	0.97	0.18	0.00	0.00	100%	0.0078	steel
Cyclo Industrial Spray Adhesive	5.6	83.00%	0.0%	83.0%	0.0%	0.00%	0.00000	4.340	4.65	4.65	0.00	0.00	0.00	0.00	0.00	100%	0.0000	aluminum
Mineral Spirits	6.5	100.00%	0.0%	100.0%	0.0%	0.00%	0.00000	4.340	6.47	6.47	0.00	0.00	0.00	0.00	0.00	100%	0.0000	aluminum
Super Kote Latex Flat Drywall Finish	12.5	38.09%	0.0%	38.1%	0.0%	0.00%	0.00030	4.340	4.76	4.76	0.01	0.15	0.03	0.00	0.00	100%	0.0010	wood
Superhide Flat Base	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.19319	4.340	3.81	3.81	3.19	76.66	13.99	0.00	0.00	100%	0.6186	wood
Black Latex Paint	12.5	39.09%	27.0%	12.1%	0.0%	40.07%	0.17090	4.340	1.52	1.52	1.13	27.01	4.93	0.00	3.79	100%	0.1728	wood
Miscellaneous Items																		
Cyclo White Grease	6.7	38.44%	0.0%	38.4%	0.0%	0.00%	0.00171	4.340	2.56	2.56	0.02	0.46	0.08	0.00	0.00	sub-total	4.4609	steel
										Sub-Total		543.25	99.14	0.01		100%	0.0055	
PAINT STATIONS EU-01A & EU-01B																		
Rollin William Paint Gray Primer	8.7	48.00%	28.9%	19.1%	0.0%	54.00%	0.49541	4.340	1.66	1.66	3.56	85.55	15.61	10.63	3.07	75%	0.7882	steel
Rollin Williams Paint Black	8.3	57.50%	36.9%	20.6%	0.0%	0.00%	1.64267	4.340	1.71	1.71	12.22	293.25	53.52	27.60	0.00	75%	2.8188	steel
SEP Operations																		
Floor Paint Light Gray	9.9	38.44%	0.0%	38.4%	0.0%	0.00%	0.45274	4.340	3.81	3.81	7.49	179.64	32.78	13.13	0.00	75%	1.4497	wood
Gray Primer	11.6	29.81%	0.0%	29.8%	0.0%	0.00%	0.02610	4.340	3.47	3.47	0.39	9.43	1.72	1.01	0.00	75%	0.0648	steel
Black Enamel	8.8	39.75%	0.0%	39.8%	0.0%	0.00%	0.09010	4.340	3.49	3.49	1.36	32.75	5.98	2.27	0.00	75%	0.2983	steel
Sub-Total																		
Sub-Total																		
Sub-Total																		
Sub-Total																		
Sub-Total																		
Sub-Total																		
Sub-Total																		

**Appendix A: Emissions Calculations**  
**VOC and Particulate**  
**From Surface Coating Operations**

**Company Name:** Haulmark Industries, Inc.  
**Address City IN Zip:** 14054 Co. Rd., 4 East Bristol, IN  
**Significant FESOP Revision:** 039-15419  
**Plt ID:** 039-00254  
**Reviewer:** Aida De Guzman  
**Date Application Received:** January 14, 2002

Material	Density (Lb/Gal)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Weight %	Weight %	Weight %	Weight %	Weight %	Xylene Emissions	Toluene Emissions	Ethyl Benzene Emissions	MEK Emissions	Hexane Emissions
GENERAL VENTILATION (GV)													
<b>Adhesive and Sealants</b>				Xylene	Toluene	Ethyl Benzene	MEK	Hexane	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
Red Contact 2621/Con-Bond	6.6	0.00000	4.340	0.00%	0.10%	0.00%	7.20%	9.10%	0.00	0.00	0.00	0.00	0.00
Red Contact Adhesive TAACT283R-05	9.9	0.00142	4.340	10.00%	10.00%	0.00%	0.00%	0.00%	0.03	0.03	0.00	0.00	0.00
616 Vulcum Alum Caulk	8.7	0.02810	4.340	0.50%	0.50%	0.00%	0.00%	0.00%	0.02	0.02	0.00	0.00	0.00
226100 Clear Geocel	7.9	0.02810	4.340	7.00%	0.00%	0.00%	0.00%	0.00%	0.30	0.00	0.00	0.00	0.00
2000 Black Geocel	8.3	0.04210	4.340	7.00%	0.00%	0.00%	0.00%	0.00%	0.46	0.00	0.00	0.00	0.00
SM 5522 Clear	8.8	0.00000	4.340	0.00%	31.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
SM6014	13.0	0.00000	4.340	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
SM6010	8.3	0.00000	4.340	0.00%	42.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
SM5504	8.3	0.01659	4.340	0.00%	42.00%	0.00%	0.00%	0.00%	0.00	1.09	0.00	0.00	0.00
SM6010	8.3	0.00095	4.340	0.00%	32.00%	0.00%	0.00%	0.00%	0.00	0.05	0.00	0.00	0.00
SM6014	13.0	0.22312	4.340	0.00%	3.00%	0.00%	0.00%	0.00%	0.00	1.66	0.00	0.00	0.00
Tremco 651	12.2	0.00000	4.340	5.00%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Tremco Vulkan 616/613	10.0	0.00000	4.340	5.00%	5.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Dap Wood Dough	9.9	0.01067	4.340	0.00%	0.00%	0.00%	10.00%	0.00%	0.00	0.00	0.00	0.20	0.00
<b>Paints</b>													
Custom Filled Spray Cans All Colors	7.4	0.00000	4.340	22.85%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Black Touch-up (Utilac)	6.3	0.00000	4.340	15.00%	20.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Rapid Dry Gloss Enamel	10.1	0.00000	4.340	15.30%	0.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
Chrome Aluminum	6.4	0.00000	4.340	0.00%	47.10%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
<b>Solvents</b>													
Thinner	9.9	0.00237	4.340	0.00%	80.00%	0.00%	0.00%	0.00%	0.00	0.36	0.00	0.00	0.00
<b>Maintenance Items</b>													
Brake Cleaner	10.8	0.00000	4.340	0.00%	21.00%	0.00%	0.00%	0.00%	0.00	0.00	0.00	0.00	0.00
P-1208 Precleaner	6.4	0.00047	4.340	0.00%	14.50%	0.00%	0.00%	0.00%	0.00	0.01	0.00	0.00	0.00
<b>PAINT STATIONS EU-01A &amp;EU-01B</b>								SUB-TOTAL	0.81	3.21	0.00	0.20	0.00
Rollin William Paint Gray Primer	8.7	0.49541	4.340	17.00%	0.00%	0.00%	0.00%	0.00%	13.90	0.00	0.00	0.00	0.00
Rollin Williams Paint Black	8.3	1.64267	4.340	0.00%	10.00%	0.00%	0.00%	0.00%	0.00	25.98	0.00	0.00	0.00
<b>SEP OPERATIONS</b>								SUB-TOTAL	13.90	25.98	0.00	0.00	0.00
Gray Primer	11.6	0.02610	4.340	17.00%	0.00%	0.00%	0.00%	0.00%	0.98	0.00	0.00	0.00	0.00
Black Enamel	8.8	0.09010	4.340	45.00%	10.00%	0.00%	0.00%	0.00%	6.77	1.50	0.00	0.00	0.00
SUB-TOTAL									6.77	1.50	0.00	0.00	0.00

**METHODOLOGY**

HAPS emission rate (tons/yr) = Density (lb/gal) \* Gal of Material (gal/unit) \* Maximum (unit/hr) \* Weight % HAP \* 8760 hrs/yr \* 1 ton/2000 lbs

worst single HAP  
Combined HAPs

21.47	30.70
	30.70
	52.37

0.20
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